

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 RONNIE SMITH,  
D-2 JORDAN JACKSON,  
D-3 BRANDON KEEL,  
D-4 JAYSON KEITH WILLIAMS,  
D-5 KASHAWN JACKSON,  
D-6 TAYQUAN MCWILLIAMS,  
D-7 MAKAELO OURSO,

Case: 2:23-cr-20489

Judge: Friedman, Bernard A.

MJ: Patti, Anthony P.

Filed: 08-23-2023

IND USA V RONNIE SMITH ET AL (SS)

Violations:

18 U.S.C. § 371

18 U.S.C. § 2312

Defendants.

/

THE GRAND JURY CHARGES:

**COUNT ONE**

*Conspiracy to Transport Stolen Vehicles*

18 U.S.C. §§ 371, 2312

D-1 RONNIE SMITH,  
D-2 JORDAN JACKSON,  
D-3 BRANDON KEEL,  
D-4 JAYSON KEITH WILLIAMS,  
D-5 KASHAWN JACKSON,  
D-6 TAYQUAN MCWILLIAMS,  
D-7 MAKAELO OURSO,

From in or about March 2023 and continuing through in or about April 2023, in the Eastern District of Michigan and elsewhere, defendants RONNIE SMITH, JORDAN JACKSON, BRANDON KEEL, JAYSON KEITH WILLIAMS, KASHAWN JACKSON, TAYQUAN MCWILLIAMS, and MAKAELO OURSO knowingly combined, conspired, confederated, and agreed together and with others, both known and unknown to the Grand Jury, to transport stolen vehicles across state lines in violation of Title 18, United States Code, Section 2312.

### **Manner and Means of the Conspiracy**

The object of the conspiracy was for the defendants and others, known and unknown to the Grand Jury, to steal motor vehicles from Pennsylvania, Virginia, Tennessee, West Virginia, and Indiana, and arrange for the sale and transportation of the stolen motor vehicles across state lines, knowing the motor vehicles had been stolen.

### **Overt Acts**

In furtherance of the conspiracy and to affect the objects of the conspiracy, the defendants and others committed the following overt acts, among others, in the Eastern District of Michigan and elsewhere:

1. On or about March 25, 2023:
  - a. Defendants RONNIE SMITH and JORDAN JACKSON traveled to the Pittsburgh International Airport in Pennsylvania.
  - b. Co-conspirators RONNIE SMITH and JORDAN JACKSON transported a stolen 2018 black Jeep Grand Cherokee Trackhawk, VIN: 1C4RJFN94JC312806, from Pittsburgh, Pennsylvania to Toledo, Ohio.
  - c. Co-conspirators driving a black Chevrolet Traverse registered to MAKAELOA OURSO exited the tollbooth of the airport parking lot and the stolen Jeep piggybacks through that exit lane on the same transaction.
  - d. Defendants RONNIE SMITH sent MAKAELOA OURSO a Telegram message with a picture of this stolen vehicle at 9:47AM: 12 minutes after it was stolen.
2. On or about April 1, 2023, and April 2, 2023, Defendants RONNIE SMITH and MAKAELOA OURSO communicated with each other about the stolen Jeep, which was located at

XXXX Macomber Street, Toledo, Ohio – the residence of  
MAKAE LA OURSO.

3. On or about March 31, 2023:
  - a. Co-conspirators RONNIE SMITH, JORDAN JACKSON, and BRANDON KEEL traveled to the lot of Ourisman Chrysler Jeep Dodge Ram in Woodbridge, Virginia and stole a 2020 red Jeep Grand Cherokee Trackhawk, VIN: 1C4RJFN92LC222931.
  - b. Co-conspirators RONNIE SMITH, JORDAN JACKSON, and BRANDON KEEL transported a stolen 2020 red Jeep Grand Cherokee Trackhawk, VIN: 1C4RJFN92LC222931, from Woodbridge, Virginia, through Pennsylvania and Ohio, and then to Eastpoint, Michigan.
  - c. Co-conspirators RONNIE SMITH, JORDAN JACKSON, and BRANDON KEEL traveled to the lot at Pittsburgh International Airport in Pennsylvania and stole a 2021 black Jeep Grand Cherokee Trackhawk, VIN: 1C4RJFN93MC809365.

- d. Co-conspirators RONNIE SMITH, JORDAN JACKSON, and BRANDON KEEL transported a stolen 2021 black Jeep Grand Cherokee Trackhawk, VIN: 1C4RJFN93MC809365, from Pittsburgh, Pennsylvania, to Toledo, Ohio.
4. On or about April 5, 2023:
  - a. Defendants RONNIE SMITH, BRANDON KEEL, and KASHAWN JACKSON traveled to the lot at the Nashville Airport in Tennessee.
  - b. Co-conspirators RONNIE SMITH, BRANDON KEEL, and KASHAWN JACKSON traveled to the lot of Indianapolis International Airport in Indiana and stole a 2021 Black Dodge Durango, VIN: 1C4SDJGJ7MC826432.
  - c. Co-conspirators RONNIE SMITH, BRANDON KEEL, and KASHAWN JACKSON transported a stolen 2021 Black Dodge Durango, VIN: 1C4SDJGJ7MC826432, from Indianapolis, Indiana, to Hazel Park, Michigan.

5. On or about April 9, 2023:
  - a. Co-conspirators RONNIE SMITH, JORDAN JACKSON, and JAYSON KEITH WILLIAMS traveled to the lot at Morgantown Dodge Stellantis in Morgantown, West Virginia, and stole a 2020 Dodge Charger, VIN: 2C3CDXL90LH129638.
  - b. Co-conspirators RONNIE SMITH, JORDAN JACKSON, and JAYSON KEITH WILLIAMS transported a stolen 2020 Dodge Charger, VIN: 2C3CDXL90LH129638, from Morgantown, West Virginia to Eastpointe, Michigan.
6. On or about April 13, 2023:
  - a. Defendants RONNIE SMITH, JORDAN JACKSON, and TAYQUAN MCWILLIAMS traveled to a Stellantis Plant in Kokomo, Indiana.
  - b. Defendants RONNIE SMITH, JORDAN JACKSON, and TAYQUAN MCWILLIAMS had key fobs, burglary tools, and a ProPad device in their vehicle in Michigan.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

*Transportation of Stolen Vehicles*  
18 U.S.C. §§ 2312, 2

D-1 RONNIE SMITH,  
D-2 JORDAN JACKSON,  
D-3 BRANDON KEEL

On or about March 31, 2023, in the Eastern District of Michigan and elsewhere, defendants RONNIE SMITH, JORDAN JACKSON, and BRANDON KEEL, aided and abetted by each other and others known and unknown to the Grand Jury, unlawfully transported and caused to be transported in interstate commerce a stolen vehicle, that is, a 2020 red Jeep Grand Cherokee Trackhawk, VIN: 1C4RJFN92LC222931, from the State of Virginia to the State of Michigan, knowing the same to be stolen, in violation of Title 18, United States Code, Sections 2312 and 2.

**COUNT THREE**

*Transportation of Stolen Vehicles*  
18 U.S.C. §§ 2312, 2

D-1 RONNIE SMITH,  
D-3 BRANDON KEEL,  
D-5 KASHAWN JACKSON

On or about April 5, 2023, in the Eastern District of Michigan and elsewhere, defendants RONNIE SMITH, BRANDON KEEL, and

KASHAWN JACKSON, aided and abetted by each other and others known and unknown to the Grand Jury, unlawfully transported and caused to be transported in interstate commerce a stolen vehicle, that is, a 2021 Black Dodge Durango, VIN: 1C4SDJGJ7MC826432, from the State of Indiana to the State of Michigan, knowing the same to be stolen, in violation of Title 18, United States Code, Sections 2312 and 2.

**COUNT FOUR**  
*Transportation of Stolen Vehicles*  
18 U.S.C. §§ 2312 & 2

D-1 RONNIE SMITH,  
D-2 JORDAN JACKSON,  
D-4 JAYSON KEITH WILLIAMS

On or about April 9, 2023, in the Eastern District of Michigan and elsewhere, defendants RONNIE SMITH, JORDAN JACKSON, JAYSON KEITH WILLIAMS, aided and abetted by each other and others known and unknown to the Grand Jury, unlawfully transported and caused to be transported in interstate commerce a stolen vehicle, that is, a 2020 Blue Dodge Charger SRT Hellcat, VIN: 2C3CDXL90LH129638, from the State of West Virginia to the State of Michigan, knowing the same to be stolen, in violation of Title 18, United States Code, Sections 2312 and 2.

## **FORFEITURE ALLEGATIONS**

The allegations contained in Counts One through Four of this Indictment are realleged and incorporated by reference to allege forfeiture under Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 982(a)(5), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense in violation of Title 18, United States Code, Sections 2 and 2312, the defendants shall forfeit to the United States, under Title 18, United States Code, Section 982(a)(5), any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of the offense.

Upon conviction of the conspiracy to violate Title 18, United States Code, Section 2312, in violation of Title 18, United States Code, Section 371, the defendants shall forfeit to the United States of America, under Title 18, United States Code, Section 981(a)(1)(C), and Title 18, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from gross proceeds traceable to the offense.

The forfeiture in this case may include entry of a forfeiture money judgment in an amount up to the value of the property subject to forfeiture for the violations of conviction.

If, by any act of omission of the defendant, the proceeds of the offenses: cannot be located upon the exercise of due diligence, have been transferred, sold to, or deposited with a third party, have been placed beyond the jurisdiction of the court, have been substantially diminished in value, or have been commingled with other property which cannot be divided without difficulty, the United States of America shall seek to forfeit substitute property under Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

**This is a True Bill.**

s/ Grand Jury Foreperson  
Grand Jury Foreperson

DAWN N. ISON  
United States Attorney

s/ Brandy R. McMillion  
BRANDY R. McMILLION  
Chief, General Crimes Unit  
Assistant United States Attorney

s/ Jasmine Ayana Moore  
JASMINE AYANA MOORE  
Assistant United States Attorney

Dated: August 23, 2023

Case: 2:23-cr-20489  
Judge: Friedman, Bernard A.  
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IND USA V RONNIE SMITH ET AL (SS)

**United States District Court  
Eastern District of Michigan**

## Criminal Case Cover

**NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.**

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>JAM</i>

**Case Title:** USA v. Ronnie Smith et al

**County where offense occurred :** Wayne and Macomb

Indictment/  Information --- no prior complaint.  
 Indictment/  Information --- based upon prior complaint [Case number: 23-mj-30331]  
 Indictment/  Information --- based upon LCrR 57.10 (d) *[Complete Superseding section below]*

## **Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- Corrects errors; no additional charges or defendants.
  - Involves, for plea purposes, different charges or adds counts.
  - Embraces same subject matter but adds the additional defendants or charges below:

**Defendant name**

## **Charges**

**Prior Complaint (if applicable)**

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

August 23, 2023

Date \_\_\_\_\_

Jasmine Ayana Moore  
Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.